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T.R.A. DOCKET ROOM
January 27, 2004

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VIA HAND DELIVERY

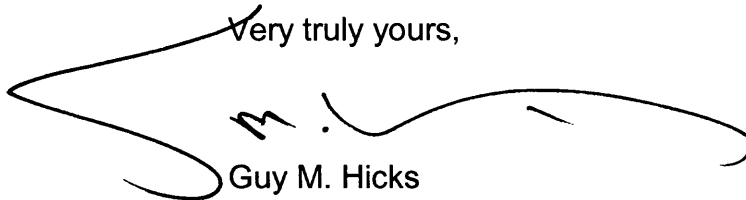
Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's
Triennial Review Order (Nine-month Proceeding)(Switching)*
Docket No. 03-00491

Dear Chairman Tate:

Enclosed are the original and fourteen copies of BellSouth's *Fourth Supplemental Response to MCI's First Interrogatories*. The attachments to Interrogatories 98, 147 and 149 are proprietary and are being provided to the Authority under separate cover. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch

REQUEST: With respect to the hot cuts identified in response to MCI-5, please provide a detailed description of each work effort your personnel had to perform, the costs you incurred, and the maximum number of hot cuts that you have accomplished per day per CLLI code since July 1, 2001.

RESPONSE:

BellSouth has a seamless hot cut process that ensures minimal end-user service outage. BellSouth's process provides for the following: pre-wiring and pre-testing of all wiring prior to the due date; verification of dial tone from the CLEC's switch; verification of correct telephone number from the CLEC switch using a capability referred to as Automatic Number Announcement ("ANAC"); monitoring of the line prior to actual wire transfer to ensure end-user service is not interrupted; and notification to the CLEC that the transfer has completed. In addition to these activities listed above, coordinated hot cuts (including coordinated / time specific hot cuts) also include: notification to the CLEC of CLEC wiring errors, dial tone or ANI problems; verification of end-user information with the CLEC prior to the conversion; verification with the CLEC of cut date and or time 24 – 48 hours prior to the conversion date; and joint acceptance testing, if necessary, with the CLEC to ensure the transfer is successful and number porting is complete.

The "costs" involved in performing hot cuts as calculated on a forward-looking basis consistent with the FCC's pricing rules were provided in connection with the UNE cost proceedings throughout the BellSouth region. These calculations were included in the filings in those proceedings, which are a matter of public record and are in the possession, custody or control of MCI.

There is no "maximum" number of hot cuts that BellSouth has established for any central office in any state in the BellSouth region. BellSouth's hot cut process is based on load volumes and force. BellSouth uses plan size methods to monitor staffing levels to ensure that expected hot cut volumes will be met.

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SUPPLEMENTAL RESPONSE:

For information concerning the actual number of hot cuts performed by BellSouth on a daily basis, see BellSouth's Supplemental Response to MCI's First Set of Interrogatories, Item No. 5.

RESPONSE PROVIDED BY: Ken Ainsworth

REQUEST: Please provide a detailed description of any current BellSouth processes that you claim will support batch cuts (as defined in Rule 51.319(d)(2)(ii)) between each of the following service configurations: 1) BellSouth voice only; 2) BellSouth voice plus DSL; 3) BellSouth DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

RESPONSE: BellSouth objects to this interrogatory on the grounds that it seeks information that is not relevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving that objection, BellSouth states that it has a batch hot cut process. The requirements for the process are set forth on Bellsouth's website.

For the configurations listed in this request that are not addressed by BellSouth's batch hot cut process, BellSouth offers the process described in response to MCI First Set of Interrogatories Item No. 94. This process will accommodate up to 14 "hot cuts" using standard intervals and will accommodate 15 or more "hot cuts" using intervals set according the Project Management process.

SUPPLEMENTAL RESPONSE:

In the batch hot cut process, BellSouth can perform at least 125 hot cuts per central office per day. BellSouth's process is scalable to handle volumes above 125 cuts per central office per day.

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SUPPLEMENTAL RESPONSE (cont'd):

Additional information concerning BellSouth's batch hot cut process is
available on BellSouth's website via the following link:

<http://www.interconnection.bellsouth.com/guides/unedocs/BulkManpkg.pdf>

RESPONSE PROVIDED BY: Ken Ainsworth/Jerry Latham

REQUEST: For each switch identified in response to MCI-97 above, please provide the information requested in TABLE F-3.

TABLE F-3

Switch CLLI	Number Of Loops Per End- User Customer Premises	Number of Local Service End-User Customer s	Type of End-User Customer	Number of Voice Only End User Customers ¹	Number of DSL Only End User Customer s	Number of Line Shared/Lin e Split DSL End User Customers ²
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	... (continue pattern as above)					
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

¹ This category includes loops used for fax and/or modem-only traffic.

² This category includes voice and DSL on the same wire pair (i.e. line sharing, line splitting, and ILEC voice plus data).

RESPONSE:

BellSouth objects to this Interrogatory to the extent it seeks information that may not be within BellSouth's possession, custody, or control. BellSouth also objects to this Interrogatory to the extent that it seeks information in a format that is neither maintained in the ordinary course of BellSouth's business nor available to BellSouth on grounds that it is overly broad, unduly burdensome, and oppressive. Subject to these objections, and without waiving these objections,

SUPPLEMENTAL RESPONSE:

Information originally provided in response to this Interrogatory was erroneous and has been corrected and is in MCI's possession, custody, or control as it was provided in BellSouth's Fourth Supplemental Response to MCI's First Request for Production of Documents, No. 1 in Fl Dkt. No. 030851-TP. This information is proprietary and is being provided subject to the terms of the protective agreement executed in this proceeding.

RESPONSE PROVIDED BY: Dr. Debra Aron

REQUEST: Please provide, on a CLLI-code-specific basis, detailed information concerning copper feeder plant that 1) has been retired since January 1, 2000 or 2) BellSouth plans to or is considering retiring in the next three years.

RESPONSE: BellSouth objects to this Interrogatory to the extent that it is overly broad, unduly burdensome, and oppressive. Subject to this objection, and without waiving this objection, BellSouth retires copper feeder facilities due to public requirements (e.g. road work or road moves) and non-discretionary replacements (e.g. damage to plant caused by storms).

BellSouth also has a website for disclosure of work associated with the above. The *Network Disclosures* will be found at:
www.interconnection.bellsouth.com/notifications/network

BellSouth cannot predict, particularly in the situation regarding public requirements, where or when copper plant will be retired because BellSouth does not know of the Tennessee Department of Transportation's plans except when advised.

SUPPLEMENTAL RESPONSE:

Information concerning the retirement of copper plant in BellSouth's network since January 1, 2002 is available at the following URL link:

<http://bellsouthcorp.com/policy/triennialreview/filings/2004-01-27/>

The file name is F1_030851-TP_BSTs_4th_Supp_Resp_to_MCI-1_Inter_Attach_125.pdf

RESPONSE PROVIDED BY: W. Keith Milner

REQUEST: Please identify, by CLLI code, all wire centers for which you receive universal service fund subsidies and provide the following information for each:

- (a) whether the subsidy is from federal or state sources
- (b) the amount of the subsidy on a per loop or per customer basis
- (c) whether the subsidy applies to all customers served by the central office/wire center, or only a portion thereof;
- (d) if the subsidy applies only to a portion of the customers, please provide the number of customers and the percentage of those customers to the total number of customers served in the central office/wire center.

SUPPLEMENTAL RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning universal service fund subsidies received by BellSouth is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, BellSouth responds as follows:

- (a) BellSouth receives federal Universal Service Interstate Access support in all nine of its states.
- (b) Information regarding federal funding that is responsive to this request can be found at the following URL:

<http://www.universalservice.org/overview/filings/2004/q1/>

- (c) See response to (b) above.
- (d) See response to (b) above.

RESPONSE PROVIDED BY: Cathy Forbes

REQUEST: With respect to any subsidies that you contend are implicit and/or explicit in your Tennessee retail rates for any service, please:

- (a) identify and describe the service;
- (b) state separately the amount of the subsidy you contend is implicit and/or explicit in the non-recurring and monthly recurring rates for the service;
- (c) provide all cost studies, calculations, and other materials that directly support your contention that the service is implicitly and/or explicitly being subsidized.

SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on the grounds that information concerning universal service fund subsidies received by BellSouth is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, BellSouth responds as follows:

- (a) BellSouth believes that Residential Basic Local Exchange Telephone Service is implicitly subsidized due to past social pricing designed to promote universal service.
- (b) BellSouth has not performed the analysis necessary to quantify the amount of the implicit subsidy in rates for Residential Basic Local Exchange Telephone Service in Tennessee.
- (c) BellSouth has not performed any cost studies or calculations in Tennessee responsive to this request.

RESPONSE PROVIDED BY: Daonne Caldwell

REQUEST: With respect to each of the voice-grade loops identified in response to F-3 above, please state the average total monthly revenues earned each month per line in Tennessee since July 1, 2001 by wire center, local access and transport area ("LATA") and metropolitan serving area ("MSA"). Also please identify the source of those revenues by service and/or feature type (i.e., local voice only, local voice plus vertical features, local long distance only, DSL only, bundles of any of the above, and/or other services or features).

SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail revenues is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth also objects to this request on grounds that it is overly broad, unduly burdensome and oppressive. Subject to these objections, and without waiving these objections, see BellSouth's Fourth Supplemental Response to MCI's First Set of Interrogatories, Item No. 147.

RESPONSE PROVIDED BY: Dr. Debra Aron

REQUEST: For each switch identified in your response to 97 above other than circuit switches, please provide the following for each switch:

- (a) all costs arising from the provision of local exchange service using the switch (including the recurring and non-recurring charges for the switch, software, installation, maintenance, loops, collocation, transmission/concentration equipment, etc.);
- (b) the average total monthly revenues earned per line in Tennessee since July 1, 2001, reported by wire center, LATA and metropolitan statistical area ("MSA"). Also please identify the source of those revenues by service and/or feature type (i.e., local voice only, local voice plus vertical features, local long distance only, DSL only, bundles of any of the above, and/or other services or features);

SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail cost and revenues is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, BellSouth has no switches responsive to this request.

RESPONSE PROVIDED BY: W. Keith Milner

REQUEST: With respect to each of the two customer categories identified in response to 110, please provide the following:

- (a) all categories and amounts of costs arising from providing local exchange service to each customer category (including the recurring and non-recurring charges for the switch, software, installation, maintenance, loops, collocation, transmission/concentration equipment, transport, hot cuts, OSS, signaling, etc.);
- (b) the average total monthly revenues earned per line since July 1, 2001 for each customer category, reported by wire center, local access and transport area ("LATA") and metropolitan serving area serving area ("MSA").
- (c) the source of all revenues derived from each category loop identified in subpart (b) by service and/or feature type (i.e., local voice only, local voice plus vertical features, local long distance only, DSL only, bundles of any of the above, and/or other services or features).

SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail costs and revenues is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth also objects to this request on grounds it is overly broad and unduly burdensome. Subject to these objections, and without waiving these objections, information concerning average revenues for BellSouth's residential and business customers is in MCI's possession, custody, or control as it was provided in BellSouth's Fourth Supplemental Response to MCI's First Request for Production of Documents, No. 1 in FI Dkt. No. 030851-TP. This information is proprietary and is being provided subject to the terms of the non-disclosure agreement executed in this proceeding.

The information provided by BellSouth is based on data from BellSouth's retail billing records from April 2003, and estimates of revenue figures that are not available directly from BellSouth's data, such as toll estimates. Further, this is average revenue per residential and business line based on BellSouth's data and may not reflect the performance of a hypothetical CLEC.

SUPPLEMENTAL RESPONSE (cont'd):

The revenue categories included in this information are defined as follows:

- “Local” includes local service (i.e., basic residence line), local usage, EUCL, OS/DA, and vertical C.O. features.
- “Toll” includes estimates of intraLATA toll, interLATA toll, international, and credit card calls.
- “Other” includes originating and terminating access, inside wire maintenance, voicemail, DSL and Direct Internet Access.

RESPONSE PROVIDED BY: Dr. Debra Aron

REQUEST: For each type of digital loop carrier ("DLC") equipment deployed by BellSouth in Tennessee, please provide BellSouth's equipment capital costs for minimum, average and maximum configurations, in terms of number of lines supported.

SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's DLC costs is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, BellSouth does not have the data in the manner requested. However, information concerning DLC equipment costs, as incorporated in BellSouth's BACE model in this proceeding, is in MCI's possession, custody, or control as it was provided in BellSouth's Fourth Supplemental Response to MCI's First Request for Production of Documents, No. 1 in FI Dkt. No. 030851-TP. This information is proprietary and is being provided subject to the terms of the non-disclosure agreement executed in this proceeding.

RESPONSE PROVIDED BY: Jim Stegeman

REQUEST: For each type of digital loop carrier ("DLC") equipment deployed by BellSouth in Tennessee, please provide BellSouth's Engineered, Furnished and Installed ("EF&I") costs for minimum, average and maximum configurations, in terms of number of lines supported.

SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's DLC costs is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, see BellSouth's Fourth Supplemental Response to MCI's First Set of Interrogatories, Item No. 149.

RESPONSE PROVIDED BY: Jim Stegeman

REQUEST: On a CLLI-code-specific basis in Tennessee, please provide the BellSouth's demand growth or decline for each of the last three years for each of the following BellSouth retail services: primary business voice lines, primary residential voice lines, additional business voice lines, additional residential voice lines, standalone DSL lines, BellSouth DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, CLEC DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, and CLEC DSL service provisioned in the high frequency portion of a loop that also supports CLEC narrowband analog voice service.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail offerings is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, see BellSouth's response to MCI First Set of Interrogatories Item No. 120 for information responsive to Interrogatory 162(h).

SUPPLEMENTAL RESPONSE:

Information concerning BellSouth's retail voice lines, BellSouth DSL lines, line sharing arrangements, and line splitting arrangements served by BellSouth is contained in BellSouth's Response to MCI First Set of Interrogatories, Item Nos. 118, 119, 120, and 121, respectively.

RESPONSE PROVIDED BY: Steve Bigelow/Eric Fogle/Tommy Williams

REQUEST: On a CLLI-code-specific basis in Tennessee, please provide BellSouth's current in-service quantities for each of the following BellSouth retail services: primary business voice lines, primary residential voice lines, additional business voice lines, additional residential voice lines, standalone DSL lines, BellSouth DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, CLEC DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, and CLEC DSL service provisioned in the high frequency portion of a loop that also supports CLEC narrowband analog voice service.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail offerings is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, see BellSouth's response to MCI First Set of Interrogatories Item No. 166 for information responsive to Interrogatory 163(h).

SUPPLEMENTAL RESPONSE:

Information concerning BellSouth's retail voice lines, BellSouth DSL lines, line sharing arrangements, and line splitting arrangements served by BellSouth is contained in BellSouth's Response to MCI First Set of Interrogatories, Item Nos. 118, 119, 120, and 121, respectively.

RESPONSE PROVIDED BY: Steve Bigelow/Eric Fogle/Tommy Williams

REQUEST: On a CLLI-code-specific basis in Tennessee, please provide BellSouth's expected, estimated or forecasted demand growth or decline for each of the next three years for each of the following BellSouth retail services: primary business voice lines, primary residential voice lines, additional business voice lines, additional residential voice lines, standalone DSL lines, BellSouth DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, CLEC DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, and CLEC DSL service provisioned in the high frequency portion of a loop that also supports CLEC narrowband analog voice service.

RESPONSE: BellSouth objects to this Interrogatory on grounds that information concerning BellSouth's retail services is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, see BellSouth's response to MCI First Set of Interrogatories Item No. 167 for information responsive to Interrogatory 164(h).

SUPPLEMENTAL RESPONSE:

Information concerning BellSouth's retail voice lines, BellSouth DSL lines, line sharing arrangements, and line splitting arrangements served by BellSouth is contained in BellSouth's Response to MCI First Set of Interrogatories, Item Nos. 118, 119, 120, and 121, respectively.

RESPONSE PROVIDED BY: Steve Bigelow/Eric Fogle/Tommy Williams

REQUEST: Please provide a copy of each executed contract (including attachments and/or amendments) between BellSouth and a long distance carrier for inter-LATA services and/or facilities.

SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on the grounds that the information requested is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory to the extent it seeks information that is in the public record or is otherwise publicly available. Subject to these objections, and without waiving these objections, contracts responsive to this request are available via the following website:

<http://bellsouthcorp.policy.net/policy/transactions/>

RESPONSE PROVIDED BY: John Ruscilli

REQUEST: Please provide average total revenue for each BellSouth wire center in Tennessee.

SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on the grounds that the information requested is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, see BellSouth's Fourth Supplemental Response to MCI's First Set of Interrogatories, Item No. 147.

RESPONSE PROVIDED BY: Dr. Debra Aron

REQUEST: For each CLLI code in Florida, please provide average revenues per line for

- (1) residential voice-only customers;
- (2) residential voice plus DSL customers;
- (3) business DS-0/voice grade customers;
- (4) business DS-1 customers; for local service, vertical features, and voice mail.

For customers in each of these four categories who also subscribe to BellSouth long distance service, provide the average long distance revenues per line.

SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on the grounds that the information requested is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, see BellSouth's Fourth Supplemental Response to MCI's First Set of Interrogatories, Item No. 147.

RESPONSE PROVIDED BY: Dr. Debra Aron

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated:

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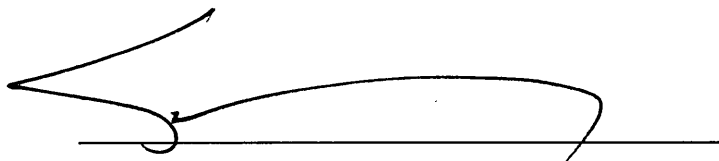
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A handwritten signature in black ink, appearing to be "Ken Woods", written over a horizontal line. The signature is stylized with a large, sweeping loop.